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August 15, 2024

VIA ECF
Honorable Michael A. Hammer
United States District Court for the
  District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

> **Re:** *United States v. Matthew Goettsche, et al.*, **19-CR-877 (CCC)**
> **Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goettsche. We respectfully move to modify his home confinement bail condition from home incarceration (Dkt. 171) as modified by this Court to curfew. Mr. Goettsche's hours of restriction to the residence shall be directed by Pretrial Services. Pretrial Services and the government, through AUSA Anthony Torntore, have no objection to this proposed request. Thank you in advance.

The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goettsche to remain under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services." The Court previously approved other proposed consent bail modifications to these conditions (dkts 187, 193, 196, 225, 229, 241, 252, 258, 262, 270, 274, 281, 283, 288, 290, 305, 311, 323, and 348). The Court previously denied a motion to modify bail conditions (dkt. 268). The aforementioned proposed modification to home confinement on curfew would not otherwise modify any other conditions as previously set forth or modified by this Court.

Respectfully submitted,

/s/ *Rodney Villazor*

Rodney Villazor, Esq.
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